

In the United States District Court for the
Middle District of Pennsylvania

Jeremy Bailey,
Plaintiff,

Civil Action no. 1:20-CV-1836

v.

Lieutenant Yoder
Sergeant John Doe
C/O John Doe.1,
C/O John Doe.2,
Defendants,

District Judge: Yvette Kane

FILED
SCRANTON

MAR 04 2021

Per. 
DEPUTY CLERK

Plaintiff
First Set of Interrogatories
to Defendants.

In accordance with Rule 33 of the Federal Rules of Civil Procedure Plaintiff request Defendant Lieutenant Yoder, Sergeant John Doe, Correctional officer John Doe.1, Correctional officer John Doe.2, answer the following interrogatories under oath, and that the answers be signed by the person making them and be served on plaintiff within 30 days of service of these interrogatories

IF you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

The interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

Plaintiff First of Interrogatories To Defendants

1. State the names or identify and attach a copy of any and all documents showing who was on duty in unit level "5" of the "R.H.U." at 6.00^{AM} to 2.00^{PM} shift on September 10, 2019.
2. State the names or identify and attach all written statements, original or copies, identifiable as reports about the incident on September 10, 2019, made by the prison and civilian employees or the Department of Corrections and prison witnesses.
3. State the names or otherwise identify the officers who moved Z-coded inmate McCullough # GA6396 from Cell 14 to Cell 15 with the plaintiff inmate Bailey # LZ4437 on September 10, 2019 in the level 5 unit, pod "2" or "B" of the R.H.U.

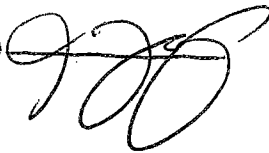
Plaintiff First of Interrogatories To Defendants

4. State the names or identify any in all rules, regulations and policies regarding to Z-Code inmates and Z-Code cell movement, attach all copies as identifiable to the plaintiff request and question.
5. Identify any and all medical records of Plaintiff from the time of the incident on September 10, 2019 in (SCI) Coal Township through and including the date of your response to this request.
6. Identify and attach a copy of any and all documents relating to all defendants staff training and education.

CERTIFICATE OF SERVICE

I, Jeremy Bailey, Certify on 26th day of February
That The Foregoing request For Documents and
Information is True and Correct under The penalty
of perjury and is being served upon The Defendant
via U.S. Mail by placing The same in The U.S.
Mail This 26th of February 2021

Respectfully Submitted
Jeremy Bailey # LZ 4437
(Sci) Coal Township
1 Kelley Drive
Coal Township pa 17866



CLERK OF COURT
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA
235 NORTH WASHINGTON AVENUE
P.O. BOX 1148
SCRANTON, PA 18501-1148
DATE: 2.26.2021

(Bailey LZ4437
in Township
eY Drive
wnship, PA 17866

INMATE MAIL
PA DEPT OF
CORRECTIONS



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Office of The Clerk
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
235 NORTH WASHINGTON AVENUE
P.O. Box 1148
SCRANTON, PA 18501-1148
PETER J. WELSH